

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CONNECTU LLC

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO  
SAVERIN, DUSTIN MOSKOVITZ, ANDREW  
MCCOLLUM, CHRISTOPHER HUGHES, and  
THEFACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG, and  
THEFACEBOOK, INC.,  
Counterclaimants,

v.

CONNECTU LLC,  
Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,  
Additional Defendants on Counterclaims.

Civil Action No. 1:04-CV-11923 (DPW)

District Judge Douglas P. Woodlock

Magistrate Judge Robert B. Collings

**[PROPOSED] ORDER GRANTING THE FACEBOOK DEFENDANTS' MOTION TO  
COMPEL AND GRANTING DEFENDANT'S CROSS-MOTION FOR PROTECTIVE  
ORDER**

For the reasons fully set forth in the Facebook Defendants' Motion to Compel Particularized Identification of Trade Secrets in Response to the Facebook Defendants' Interrogatory Number 2, the Court finds that ConnectU's response to Interrogatory Number 2 fails to describes "with **rigorous and focused particularity** what, and only what, the plaintiff[] claim[s] to constitute the trade secrets allegedly misappropriated by ... the defendants that form

the basis for this law suit,” as required by Massachusetts law. *Staffbridge, Inc. v. Nelson Assocs., Inc.*, No. 024912-BLS, 2004 WL 1429935, at \*1, 4 (Mass. Super. June 11, 2004). *See also L-3 Communications Corp. v. Reveal Imaging Technologies, Inc.*, No. 035810BLS, 2004 WL 2915743, \*13 (Mass. Super. Dec. 2, 2004); *Microwave Research Corp. v. Sanders Associates, Inc.*, 110 F.R.D. 669, 673 (D. Mass. 1986).

Accordingly, the Facebook Defendants’ having demonstrated GOOD CAUSE,

IT IS HEREBY ORDERED:

Facebook Defendants’ Motion to Compel Particularized Identification of Trade Secrets in Response to the Facebook Defendants’ Interrogatory Number is GRANTED, and ConnectU is hereby FURTHER ORDERED to provide a supplemental Response to the Facebook Defendants’ Interrogatory Number 2 that lists with rigorous and focused particularity any and all trade secrets ConnectU alleges the Defendants have misappropriated on or before \_\_\_\_\_. The Defendants need not produce discovery related to ConnectU’s claims until such time as appropriate Supplementation to ConnectU’s Response to Interrogatory Number 2 is made.

IT IS SO ORDERED

Dated: \_\_\_\_\_, 2005

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Hon. Douglas P. Woodlock